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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No. 21-CR-274 CRB
	)	
Plaintiff,	)	
	)	STIPULATION AND <del>PROPOSED</del> ORDER
v.	)	CONTINUING HEARING
	)	
IAN BENJAMIN ROGERS, and	)	
JARROD COPELAND,	)	
	)	
Defendants.	)	
	)	
	)	

On July 8, 2021, the grand jury issued a six-count indictment charging Ian ROGERS and Jarrod COPELAND with conspiring to destroy a building by arson or explosive device, weapons violations and obstruction of justice. ROGERS has been (and remains) in custody in Napa County facing weapons charges since January, 2021. The parties made their first appearance in District Court on August 18,

1 2021. ROGERS appeared pursuant to a writ issued February 18, 2021. At that time, the parties agreed  
 2 to continue the matter for a status conference on October 27, 2021. Since then, the government has  
 3 provided additional discovery. In addition, counsel for ROGERS has been engaged in a multi-week  
 homicide trial in state court.

4 The parties hereby request that the Court continue the status hearing from October 27, 2021 to  
 5 December 14, 2021. The continuance will allow the government the time needed to produce additional  
 6 discovery and enable both parties to be in a better position to discuss both the pending charge and  
 7 potential resolution. In addition, it will allow the parties the ability to coordinate with counsel in the  
 parallel state proceeding. The government has been negotiating his transfer to federal custody, but as of  
 8 this filing, he remains in state custody.

9 For these reasons, and to allow for the effective preparation of counsel, the parties agree that the  
 10 ends of justice served by excluding the time from October 27, 2021 through December 14, 2021 from  
 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a  
 speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

11 IT IS SO STIPULATED.

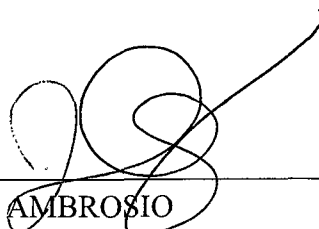
12 DATED: October 19, 2021

Respectfully submitted,

13 STEPHANIE M. HINDS  
 Acting United States Attorney

14 \_\_\_\_\_/s/\_\_\_\_\_  
 FRANK J. RIEBLI  
 Assistant United States Attorney

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 17 \_\_\_\_\_/s/ Frank Riebli w/ permission for \_\_\_\_  
 COLIN COOPER  
 Attorney for Ian Rogers

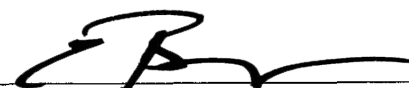
  
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 JOHN AMBROSIO  
 Attorney for Jarrod Copeland

**~~PROPOSED~~ ORDER**

For the reasons set forth above, the Court hereby continues the status hearing in the above-captioned matter from October 27, 2021 until **December 14, 2021, at 10:00 a.m.** Further, to allow for the continued production of discovery and the effective preparation of counsel, the Court finds that the ends of justice served by granting the continuance outweigh the interests of the public and the defendant, and thus the Court excludes that period of time from the running of the speedy trial clock under Rule 5.1 and 18 U.S.C. § 3161(b). The Court further orders that, to the extent that Ian Rogers remains in state custody, the U.S. Marshal and the Director of Corrections of the Napa County Department of Corrections shall produce Ian Rogers for the hearing on December 14, 2021, as provided in the writ issued on February 18, 2021 in this matter.

IT IS SO ORDERED.

November 1, 2021  
 DATED: ~~October~~ November, 2021

  
 \_\_\_\_\_  
 HON. CHARLES R. BREYER  
 United States District Judge